

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

KENNETH PRITCHARD,

Plaintiff,

v.

Civil Action No. 1:18-cv-1432-AJT-TCB

METROPOLITAN WASHINGTON
AIRPORTS AUTHORITY

Defendant.

AFFIDAVIT OF TANISHA LEWIS

My name is Tanisha Lewis and I reside in Washington, D.C. I am over eighteen (18) years of age and am competent to testify. I make the following declaration based on my personal knowledge of the following facts:

1. I am employed as the Human Capital Management Performance and Business Readiness Manager for the Metropolitan Washington Airports Authority ("Airports Authority").
2. I am an African-American female.
3. I began employment with the Airports Authority in 1996, as an intern and I have held a succession of increasingly responsible positions since then. I currently supervise 5 employees. I was responsible for the conversion in 2018 of the Airports Authority software for human resources and payroll functions from a system known as Ceridian to a cloud-based system known as Workday, a process which took more than two years to implement, after the award of the contract. In connection with this project, which touches all aspects of personnel, I met with many managers, supervisors and employees throughout Human Resources and the Authority.
4. As managers who report to the Vice President for Human Resources and



Administrative Services, Anthony Vegliante, we both regularly attended Mr.

Vegliante's staff meetings and during these staff meetings I regularly observed Mr.

Pritchard's disrespectful manner toward Vice President Vegliante.

5. In 2015 and 2016, Mr. Pritchard became increasingly aggressive. He would yell, scream, and refuse to cooperate in programs with which he did not agree. I specifically remember a meeting involving the implementation of a new Pay for Performance (PfP) system, to which Mr. Pritchard objected. I remember him yelling, wagging his finger and cursing. His behavior was so outlandish and unprofessional that I simply left the meeting when he failed to curb his outbursts.
6. I believe Mr. Pritchard wanted to intimidate people, and he made faces and grunted to have that effect. I find it offensive that Mr. Pritchard, a manager at the Airports Authority, routinely used hand gestures and the middle finger, yelled at people in public and lacked any sense of professional propriety.
7. I observed Mr. Pritchard telling members of his staff not to talk to the "brain trust" or the "Postal Service people," meaning the CEO, John Potter and our Vice President, Anthony Vegliante.
8. I remember talking to Gail Endicott in July 2016, wherein she confided in me how Mr. Pritchard's abusive behavior was affecting her. I encouraged her to report her concerns to Robin Wade, who is the manager of Employee and Labor Relations and is responsible for investigating complaints made by Airports Authority employees. I did so because I was concerned about her physical and mental health.
9. Mr. Pritchard would refer to CEO John Potter and V.P. of Human Resources Anthony Vegliante derogatively as the "brain trust" or the "postal service people."

10. I recall an incident where Mr. Pritchard came late to a meeting with other departments, pulled all his staff out into the hallway, and then proceeded to yell at his staff for having gone into the meeting without him. This meeting was important in planning for the implementation of the Workday system.

11. I found Mr. Pritchard's behavior and use of profanity to be offensive.

I solemnly declare and affirm, under penalty of perjury under the laws of the United States, that the contents of the foregoing paper are true and correct to the best of my knowledge, information and belief.

Date: 09/06/19


Tanisha Lewis